

Exhibit J

From: Carter, Sean <SCarter1@cozen.com>
Sent: Monday, May 21, 2018 1:46 PM
To: Kellogg, Michael K.
Cc: Rapawy, Gregory G.; WTC[jflowers@motleyrice.com]; Haefele, Robert; jeubanks@motleyrice.com; Kreindler, James; Steven R. Pounian; Goldman, Jerry; Tarbutton, Joseph; Hansen, Mark C.; Shen, Andrew C.; Margo, Benjamin D.
Subject: RE: 03 MDL 1570 Meet and Confer

Michael:

For the joint letter, please include Plaintiffs' May 11, 2018 correspondence concerning the Kingdom's discovery requests to Plaintiffs. Otherwise fine.

With regard to the discussion about the additional repositories during our meet and confer, we raised the broader issue that repositories of relevant documents had been excluded from the Kingdom's proposed searches, citing a few examples in support of our view on the point. We indicated that we would follow up with a more complete list, as we did below.

Thanks, Sean



Sean P. Carter

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From: Kellogg, Michael K. [mailto:mkellogg@kellogghansen.com]
Sent: Monday, May 21, 2018 12:34 PM
To: Carter, Sean
Cc: Rapawy, Gregory G. ; WTC[jflowers@motleyrice.com] ; Haefele, Robert ; jeubanks@motleyrice.com; WTC[jkreindler@kreindler.com] ; Steven R. Pounian ; WTC[jgoldman@andersonkill.com] ; Tarbutton, J. Scott ; Hansen, Mark C. ; Shen, Andrew C. ; Margo, Benjamin D.
Subject: Re: 03 MDL 1570 Meet and Confer

Sean:

Attached is a draft of the joint letter submitting discovery requests and responses. Please let us know if you have any changes.

A 7 p.m. target for filing is fine here.

We will not agree to search the additional agencies mentioned in your e-mail, including what appear to be at least five new ones that were not raised during our meet-and-confer on Thursday.

Michael

From: "Carter, Sean" <SCarter1@cozen.com>
Date: Monday, May 21, 2018 at 5:51 PM
To: "Kellogg, Michael K." <mkellogg@kelloggghansen.com>
Cc: "Rapawy, Gregory G." <grapawy@kelloggghansen.com>, "WTC[jflowers@motleyrice.com]" <jflowers@motleyrice.com>, "Haefele, Robert" <rhaefele@motleyrice.com>, "jeubanks@motleyrice.com" <jeubanks@motleyrice.com>, "Kreindler, James" <jkreindler@kreindler.com>, "Steven R. Pounian" <Spounian@kreindler.com>, "Goldman, Jerry" <jgoldman@andersonkill.com>, "Tarbutton, Joseph" <starbutton@cozen.com>, "Hansen, Mark C." <mhansen@kelloggghansen.com>, "Shen, Andrew C." <ashen@kelloggghansen.com>, "Margo, Benjamin D." <bmargo@kelloggghansen.com>
Subject: RE: 03 MDL 1570 Meet and Confer

Michael:

Thank you. We agree a joint letter transmitting the discovery requests and responses makes sense. Do you want to prepare a draft for our consideration?

In terms of the proposed simultaneous filing, the process of securing final sign offs is obviously a bit more complicated on our side given the number of camps involved, and I believe a few people are tied up for significant parts of today. To be on the safe side, it would make sense to target 7 pm for the simultaneous filing, with the understanding that we will let you know if we have all necessary sign offs earlier.

With regard to our discussion about additional repositories that should be searched in response to the discovery requests, we would propose that any repositories where responsive and relevant documents are known to exist should be included. We would expect that would include the ministries and offices identified below. Please let us know if the Kingdom will agree to conduct searches for information and documents in these additional locations.

Investigative and similar files relating to the September 11th attacks
The Saudi Cultural Mission in Washington DC
The Ministry of Defense and Aviation (MODA)
The Saudi Arabian Education Mission
The Saudi Arabian National Guard
The Ministry of Higher Education
The Ministry of Finance
The Ministry of Interior
General Investigation Directorate aka the Mahabith
General Intelligence Directorate aka the Mukhabarat
The Presidency of State Security
The Ministry of Foreign Affairs
The Ministry of Civil Service
The Kingdom's Embassy and Consulates in the United Kingdom

Best, Sean



Sean P. Carter

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From: Kellogg, Michael K. [<mailto:mkellogg@kellogghansen.com>]
Sent: Sunday, May 20, 2018 9:15 AM
To: Carter, Sean <SCarter1@cozen.com>
Cc: Rapawy, Gregory G. <grapawy@kellogghansen.com>; WTC[jflowers@motleyrice.com] <jflowers@motleyrice.com>; Haefele, Robert <rhaefele@motleyrice.com>; jeubanks@motleyrice.com; WTC[jkreindler@kreindler.com] <jkreindler@kreindler.com>; Steven R. Pounian <Spounian@kreindler.com>; WTC[jgoldman@andersonkill.com] <jgoldman@andersonkill.com>; Tarbutton, J. Scott <STarbutton@cozen.com>; Hansen, Mark C. <mhansen@kellogghansen.com>; Shen, Andrew C. <ashen@kellogghansen.com>; Margo, Benjamin D. <bmargo@kellogghansen.com>
Subject: Re: 03 MDL 1570 Meet and Confer

Sean:

In response to the issues raised in the meet and confer, we will agree, subject to all our general objections and our objections to the instructions and definitions (except as explicitly amended below), to search for and produce responsive documents as follows:

1. In response to RFPs 4, 5, 27, 28, 30, 33, 61, 62, 68, we will search for and produce any responsive documents for the requested periods prior to January 1, 1998.
2. We will add Yazid al Salmi to the construction of "subagents" in Objections to Definitions number 6. Mr. al Salmi was inadvertently omitted from our Response.

One other issue I wanted to raise with you is whether it makes sense for the parties to file a short joint letter attaching all discovery requests and responses as exhibits so that we do not have to submit all that material twice.

Also, can we agree on a time for simultaneous filing of our letters tomorrow? I would propose 5 p.m. EDT.

Michael Kellogg

From: "Carter, Sean" <SCarter1@cozen.com>
Date: Wednesday, May 16, 2018 at 2:18 AM
To: "Kellogg, Michael K." <mkellogg@kellogghansen.com>
Cc: "Rapawy, Gregory G." <grapawy@kellogghansen.com>, "WTC[jflowers@motleyrice.com]" <jflowers@motleyrice.com>, "Haefele, Robert" <rhaefele@motleyrice.com>, "jeubanks@motleyrice.com" <jeubanks@motleyrice.com>, "Kreindler, James" <jkreindler@kreindler.com>, "Steven R. Pounian" <Spounian@kreindler.com>, "Goldman, Jerry" <jgoldman@andersonkill.com>, "Tarbutton, Joseph" <starbutton@cozen.com>, "Hansen, Mark C." <mhansen@kellogghansen.com>
Subject: Re: 03 MDL 1570 Meet and Confer

Thanks.

Sent from my iPhone

On May 15, 2018, at 2:52 PM, Kellogg, Michael K. <mkellogg@kellogghansen.com> wrote:

Sean. That should work but we just arrived in Riyadh and need to check on our meeting schedule. If we could do 1 pm I think that would be slightly better for us. Will confirm first thing tomorrow.

Michael

On May 15, 2018, at 9:04 PM, Carter, Sean <SCarter1@cozen.com> wrote:

Michael and Greg: Are you available to meet and confer by phone this Thursday, May 17? A call in the afternoon New York time would be preferable for us, say around 1:30, but if that is not feasible for you we can try to free up the morning. Thanks, Sean



Sean P. Carter

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